

AO 91 (Rev. 08/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the  
Southern District of Texas

United States of America

v.

Rosa Maria ZUNIGA SAGRERO  
YOB: 1996 CITIZENSHIP: USA

Case No. M-22- 0184 -M

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 24, 2022 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:*Code Section**Offense Description*

31 USC 5332

did knowingly and intentionally possess \$ 114,294 in currency with the intent to evade a currency reporting requirement and transport or transfer or attempt to transport or transfer such currency or monetary instruments from a place within the United States to a place outside of the United States

This criminal complaint is based on these facts:

SEE ATTACHMENT "A"

United States District Court  
Southern District of Texas  
FILED

APR 25 2022

Nathan Ochsner, Clerk

✓ Continued on the attached sheet.

/s/ Nathan Tong

*Complainant's signature*

Nathan Tong, H.S.I. Special Agent

*Printed name and title*

Complaint authorized by AUSA Robert Guerra

Submitted by reliable electronic means, sworn to and attested  
telephonically per Fed.R.Cr.P.4.1, and probable cause found on:

Date:

April 25, 2022 @ 11:58 am

*Judge's signature*

City and state: McAllen, Texas

U.S. Magistrate Judge Juan F. Alanis

*Printed name and title*

**Attachment "A"**

- 1. On April 24, 2022, Rosa Maria ZUNIGA SAGRERO was encountered by US Customs and Border Protection Officers ("CBPOs") at the Hidalgo Port of Entry in Hidalgo, Texas, as the sole occupant of a taxi vehicle attempting to exit the United States to Mexico.**
- 2. ZUNIGA SAGRERO was selected for additional inspection. ZUNIGA SAGRERO stated she was traveling to Reynosa, Mexico. Consistent with federal law, CBPOs asked ZUNIGA SAGRERO whether she had any firearms, ammunition, or currency in excess of \$10,000.**
- 3. During inspection, CBPOs discovered three bulk currency packages within the jacket and purse carried by ZUNIGA SAGRERO. ZUNIGA SAGRERO was physically holding the jacket at the time of encounter. The bulk currency inside the three packages was sealed in plastic bags and wrapped with black tape. In total \$114,294 in U.S. currency was discovered in the three packages and the additional currency in ZUNIGA SAGRERO's purse.**
- 4. CBPOs notified ZUNIGA SAGRERO of the need to declare U.S. currency over \$10,000 and she denied needing to declare any U.S. currency. Additionally, ZUNIGA SAGRERO was holding the jacket that had the currency packages within the pockets, therefor I believe that she was aware of the currency and knowingly concealed it in violation of 31 U.S.C. 5332.**